

## **Exhibit 20**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

|                                       |   |                             |
|---------------------------------------|---|-----------------------------|
| Dwayne PHILLIPS, <i>et al.</i> ,      | ) |                             |
|                                       | ) |                             |
| Plaintiffs,                           | ) |                             |
|                                       | ) |                             |
| vs.                                   | ) |                             |
|                                       | ) | Case No. 3:22CV0075-RSB-JCH |
| RECTOR AND VISITORS OF THE UNIVERSITY | ) |                             |
| OF VIRGINIA, <i>et al.</i> ,          | ) | <b><u>CONFIDENTIAL</u></b>  |
|                                       | ) |                             |
| Defendants.                           | ) |                             |
|                                       | ) |                             |
|                                       | ) |                             |

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**DEFENDANT UVA’S AMENDED ANSWER TO PLAINTIFFS’  
INTERROGATORY NO. 1**

Defendant Rector and Visitors of the University of Virginia (“UVA”), by counsel, hereby provides this Amended Answer to Plaintiffs’ Interrogatory No. 1. UVA incorporates all prior objections to the Definitions and Instructions contained in Plaintiffs’ Interrogatories as if fully set forth herein.

**OBJECTIONS AND AMENDED ANSWER TO INTERROGATORY NO. 1**

**INTERROGATORY # 1:** Provide the following information for any of your current or former employees who had any responsibility for, or duties related to, the development, implementation, application, or evaluation of any COVID Vaccine Policy: (a) name; (b) title; (c) description of responsibilities and duties related such policy or policies; (d) dates the employee performed or had such responsibilities or duties; and (e) whether such individual is one of the Doe Defendants referenced in the Third Amended Complaint.

**OBJECTION TO INTERROGATORY #1:** UVA incorporates by reference its objections to the term “COVID Vaccine Policy.” UVA further objects to this Interrogatory as over broad and unduly burdensome, and seeking information that is not relevant to this litigation or

proportional to the needs of the case. The only COVID Vaccine Policy at issue is the policy described in OCH-002 and applicable to Health System Facilities, referred to herein as the OCH-002 COVID Vaccine Policy. UVA further objects to this Interrogatory to the extent it seeks information regarding the 2022 Procedure because none of the Plaintiffs sought or were denied a religious exemption under that procedure. UVA further objects to this Interrogatory because it is overly broad and unduly burdensome to the extent it seeks information for any current or former employee who had any responsibility for, or duties related to, the development implementation, application of evaluation, of any “COVID Vaccine Policy.”

**ANSWER TO INTERROGATORY #1:** Subject to and without waiving its objections, UVA responds as follows:

The following individuals, with assistance and advice from counsel, had primary responsibility for the decision to require COVID vaccination as part of OCH-002, and to provide for religious and medical exemptions. This decision was made for new hires in the summer of 2021, and was extended to Tier 1 Team Members on or around August 25, 2021.

Dr. Craig Kent, Chief Executive Officer, UVA Health, Executive Vice President, Health Affairs

Wendy Horton, Chief Executive Officer, UVA Medical Center

Dr. Costi Sifri, Director of Hospital Epidemiology

The following individuals, with assistance and advice from counsel, had primary responsibility for the review of religious exemption requests related to the OCH-002 COVID Vaccine Policy from July 1, 2021 through approximately August 2022 -- although the overwhelming majority of the requests were reviewed and decision was made prior to December 31, 2021.

Melissa Frederick – former Assistant Vice President of Human Resources, UVA Health

**CONFIDENTIAL**  
**DISCLOSED PURSUANT TO AGREEMENT STATED IN RULE 26(F) REPORT AND**  
**WRITTEN CONFIRMATION OF PLAINTIFFS' COUNSEL**  
**ALSO SUBJECT TO PENDING MOTION AT DOCKET #186 AND TO BE FILED**  
**PROTECTIVE ORDER**

██████████ – HR business partner; voting member of Religious Exemption Committee

██████████ – HR business partner; voting member of Religious Exemption Committee

██████████ – HR business partner; voting member of the Religious Exemption Committee

██████████ – HR business partner; voting member of the Religious Exemption Committee

██████████ – HR business partner; voting member of the Religious Exemption Committee

**AMENDED ANSWER TO INTERROGATORY #1:** Subject to and without waiving its objections, UVA amends its response to Interrogatory No. 1 as it relates to the decision to require COVID vaccination as part of OCH-002 and to provide for religious and medical exemptions.

As previously stated, the decision to require COVID vaccination as part of OCH-002, and to provide for religious and medical exemptions, was made with assistance and advice of counsel. These issues were discussed over an extended period of time and involved numerous participants, including the following:

K. Craig Kent, M.D., Chief Executive Officer, UVA Health, Executive Vice President,  
Health Affairs

Wendy Horton, PharmD, MBA, Chief Executive Officer, UVA Medical Center

Costi D. Sifri, M.D., Director of Hospital Epidemiology

Reid B. Adams, M.D., F.A.C.S., Chief Medical Officer

Bobby Chhabra, M.D., President, UPG

Pam Cipriano, Ph.D, Dean of School of Nursing

Mitchell H. Rosner, M.D., MACP, Chair, Department of Medicine

David S. Wilkes, M.D., Dean of School of Medicine

Ultimately, a consensus decision was reached, and the decision for new hires was announced on June 24, 2021 (UVA\_0009154) and the decision for existing team members was announced on August 25, 2021 (UVA\_0001956).

UVA incorporates by reference its prior response as to the review of religious exemption requests.

Dated: September 4, 2024

By: /s/ Wendy C. McGraw  
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*Attorneys for Defendant Rector and Visitors of  
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### CERTIFICATE OF SERVICE

I certify that on this 4th day of September, 2024, I served this document via email on the following:

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